

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GOVERNMENT'S PROPOSED JURY VOIR DIRE QUESTIONS

The United States of America, by and through its attorney, the United States Attorney for the District of Massachusetts, hereby requests that, in addition to those questions commonly put to the jury in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

A. Experience with Drugs

1. Have you or anyone close to you ever had a substance abuse problem, with prescription drugs, non-prescription drugs, street drugs, or alcohol?
2. Have you or anyone close to you ever been arrested or prosecuted for a drug-related crime?
3. Have you ever testified as a witness in the trial of a drug-related crime?
4. Have you or anyone close to you ever worked or volunteered your services to any organization which treats people with drug problems?
5. Do you believe in the de-criminalization of any drugs which it is currently illegal to sell or use?

B. Feelings toward the Government or Law Enforcement

1. Have you or anyone close to you ever been charged with a crime or been the subject of a criminal investigation?
2. Have you or anyone close to you ever appeared or testified as a witness in any criminal investigation or proceeding?
3. Have you or anyone close to you either applied to work or actually worked in any area of law enforcement (for example, any prosecutor's office, whether federal or state; any police agency, whether federal or state; any probation or corrections office, whether federal or state)?
4. Have you or anyone close to you ever worked for a criminal defense

lawyer or a private investigator?

5. Have you or anyone close to you ever had an experience with local, state, or federal government which you would describe as especially unfavorable or especially favorable?

C. General

1. Is there any matter that you should call to the Court's attention that may have any bearing on your qualifications to serve as a juror or that may affect your ability to render an impartial verdict based solely on the evidence or the lack thereof and the court's instructions on the law?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Kimberly P. West
KIMBERLY P. WEST
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Kimberly P. West
Kimberly P. West
Assistant U.S. Attorney

Dated: May 5, 2006